

1 DAVID L. ANDERSON (CABN 149604)
United States Attorney

2 BARBARA J. VALLIERE (DCBN 439353)
3 Chief, Criminal Division

4 FRANK J. RIEBLI (CABN 221152)
NEAL HONG (ILBN 6309265)

5 Assistant United States Attorneys
1301 Clay Street, Suite 340S
6 Oakland, California 94612
Telephone: (510) 637-3680
7 FAX: (510) 637-3724
Frank.Riebli@usdoj.gov
8 Neal.Hong@usdoj.gov
Attorneys for United States of America

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION
12

13 UNITED STATES OF AMERICA,)	Case No. CR 18-448 JST
)	
14 Plaintiff,)	STIPULATION AND
)	
15 v.)	PROPOSED
)	
16 AINSLEE SMITH, et al,)	ORDER EXCLUDING TIME
)	
17 Defendants.)	
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20 The parties appeared on February 1, 2019. That appearance was the First Appearance for three
21 of the four defendants. At that hearing, the government advised the Court that it had produce a
22 substantial amount of discovery, including investigative reports, photos, videos, audio recordings, and
23 GPS data, and the legal process the government used to obtain some of the evidence in this case. The
24 government advised that it had additional discovery to produce, including cell phone downloads. The
25 parties agreed that the defendants require time to review and consider that evidence. For that reason,
26 and to allow time for the government to complete the cell phone downloads and produce them, the
27 parties asked that the Court continue the matter until April 5, 2019 at 9:30 a.m., and that the Court
28 exclude time between February 1, 2019 and April 5, 2019 for the effective preparation of counsel. The

1 parties agreed that the need to prepare outweighed the public's and the defendants' interests in a speedy
2 trial. 18 U.S.C. § 3161(h)(7)(B)(iv).

3
4 DATED: February 15, 2019

Respectfully submitted,

5 DAVID L. ANDERSON
6 United States Attorney

7 FRANK J. RIEBLI
8 NEAL HONG
9 Assistant United States Attorneys

10 /s/ Frank Riebli w/ permission
11 TONY TAMBURELLO
12 Attorney for Ainslee Smith


13 /s/ Frank Riebli w/ permission
14 RICHARD TAMOR
15 Attorney for Britt Dunn

16 /s/ Frank Riebli w/ permission
17 SCOTT SUGARMAN
18 Attorney for Tyler Soohoo

19 /s/ Frank Riebli w/ permission
20 MICHAEL LEVINSOHN
21 Attorney for Michael Swenk

22 For the reasons stated above, the Court finds that time is properly excluded from February 1,
23 2019 to and including April 5, 2019 for the effective preparation of counsel, and that these interests
24 outweigh the interests of the public and the defendants in a speedy trial. 18 U.S.C. § 3161(h)(7)(b)(iv).
25 SO ORDERED.

26 DATED: February 22, 2019

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28 HON. JON S. TIGAR
United States District Judge